

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF
AMERICA

v.

EDMOND LAFRANCE,

Defendant.

CRIMINAL No. 16-CR-10090-IT

JOINT MOTION FOR ENTRY OF ORDER OF EXCLUDABLE DELAY

The United States and defendant Edmond LaFrance hereby jointly move that the Court enter an order of excludable delay for the period between October 4, 2016 and August 14, 2017. Such exclusion is in the interests of justice pursuant to 18 U.S.C. § 3161(h)(7)(A) to enable the defendant and his counsel to review materials produced during discovery, for defense counsel to assess and file potential dispositive motions, and for the defendant to maintain continuity of counsel in light of his current counsels' conflicting trial commitments.

Respectfully submitted,

CARMEN M. ORTIZ
United States Attorney

By: /s/ Stephen P. Heymann
Stephen P. Heymann
Assistant U.S. Attorney

/s/ Paul Kelly & John Commisso by sph
Paul Kelly
John Commisso
Counsel for Defendant Edmond LaFrance

Date: October 7, 2016

Certificate of Service

The undersigned certifies that this Joint Motion is being served on all counsel of record in this case by ECF.

/s/Stephen P. Heymann
Stephen P. Heymann
Assistant U.S. Attorney